

1 LAW OFFICE OF KEN SCHNEIDER, PS  
2 2015 33<sup>rd</sup> Street  
3 Everett, WA 98201  
(425) 258-2704

The Honorable Christopher M. Alston  
United States Bankruptcy Judge

4 Date: October 18, 2019  
5 Time: 9:30 a.m.

6 Location: US Bankruptcy Court  
7 700 Stewart Street Rm 7206  
Seattle, WA 98101

8 Response Deadline: October 11, 2019

9 UNITED STATES BANKRUPTCY COURT  
10 WESTERN DISTRICT OF WASHINGTON  
11 AT SEATTLE

12 In re: ) IN PROCEEDINGS UNDER CHAPTER 7  
13 STACIE ESTAY ) NO. 19-12349  
14 ) AMENDED MOTION TO AVOID LIEN  
15 Debtors. ) OF CREDIT INTERNATIONAL  
CORPORATION  
AND NOTICE THEREOF

16 NOTICE

17 Please take notice that the undersigned will bring on for a hearing a Motion to Avoid Lien of  
18 Credit International Corporation before the Honorable Christopher M. Alston, United States  
19 Bankruptcy Judge, on the date above noted, in said Judge's regular courtroom, U.S. Bankruptcy  
20 Court, 700 Stewart Street, Seattle, Washington, 98101, or at such other time and place as the  
21 Clerk of the Court may direct. Anyone opposing the relief requested above must file written  
22 objection with the Clerk of the Court no later than seven (7) days prior to the hearing. If no  
23 response is filed within the time allowed, the court may in its discretion grant the motion prior to  
24 the hearing, without further notice.

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27 AMENDED MOTION TO AVOID LIEN - 1

LAW OFFICE OF KEN SCHNEIDER, PS  
2015 33<sup>rd</sup> STREET  
EVERETT, WA 98201 (425) 258-2704

1 MOTION

2 1. Debtor's employer, Regus Management Group, LLC, (garnishee), was served with a writ  
3 of garnishment by creditor Credit International Corporation, (Judgment Creditor) in  
4 Snohomish County Superior Court case number 13-2-07327-5  
5  
6 2. The registered agent for the Judgment Creditor, is Larry A. Johnston, 144 Railroad  
7 Avenue Ste. 203, Edmonds, WA 98020 and its principal office is located at 10413  
8 Beardslee Blvd Ste. A, Bothell, Washington 98011. Exhibit A.  
9  
10 3. Snohomish County Superior Court is holding \$784.74 pursuant to a writ of garnishment  
11 issued by the judgment creditor. The garnished funds were disclosed and claimed as  
12 exempt in the debtor's schedules.  
13  
14 4. Judgment Creditor has a judicial lien on these funds.  
15  
16 5. 11 U.S.C. §522 (f) permits the debtor to avoid a lien to the extent that it impairs an  
17 exemption to which the debtor would have been entitled.  
18  
19 6. The entire amount held by Snohomish County Superior Court would have been exempt if  
20 paid over to the debtor and the entire amount is impaired by the lien.

21 WHEREFORE the debtor moves the court for:

22 1. An order avoiding the lien of judgment creditor and directing the Snohomish County Superior  
23 Court to pay over, to the debtor's attorney, all funds held pursuant to the writ of garnishment.  
24  
25 2. For such other relief as the court shall order.

26  
27 DATED: 9-12-19

/s/ Ken Schneider  
Ken Schneider, WSBA #22410  
Attorney for Debtor

28 AMENDED MOTION TO AVOID LIEN - 2

LAW OFFICE OF KEN SCHNEIDER, PS  
2015 33<sup>rd</sup> STREET  
EVERETT, WA 98201 (425) 258-2704

## BUSINESS INFORMATION

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Business Name:

**CREDIT INTERNATIONAL CORPORATION**

UBI Number:

**601 048 069**

Business Type:

**WA PROFIT CORPORATION**

Business Status:

**ACTIVE**

Principal Office Street Address:

**10413 BEARDSLEE BLVD STE A, BOTHELL, WA, 98011-3463, UNITED STATES**

Principal Office Mailing Address:

**10413 BEARDSLEE BLVD STE A, BOTHELL, WA, 98011-3463, UNITED STATES**

Expiration Date:

**09/30/2020**

Jurisdiction:

**UNITED STATES, WASHINGTON**

Formation/ Registration Date:

**09/29/1987**

Period of Duration:

**PERPETUAL**

Inactive Date:

Nature of Business:

**OTHER SERVICES**

## REGISTERED AGENT INFORMATION

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Registered Agent Name:

**LARRY A. JOHNSTONE, ATTY AT LAW, PLLC**

Street Address:

**144 RAILROAD AVE STE 203, EDMONDS, WA, 98020-4121, UNITED STATES**

Mailing Address:

**144 RAILROAD AVE STE 203, EDMONDS, WA, 98020-4121, UNITED STATES**

## GOVERNORS

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Title	Governors Type	Entity Name	First Name	Last Name
GOVERNOR	INDIVIDUAL		ROBERT	BAKKER
GOVERNOR	INDIVIDUAL		SUSAN	MUNROE
GOVERNOR	INDIVIDUAL		ALEX	GALLEGOR

## EXHIBIT A

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11 LAW OFFICE OF KEN SCHNEIDER, PS  
12 2015 33rd Street  
13 Everett, WA 98201  
14 (425) 258-2704

The Honorable Marc Barreca  
United States Bankruptcy Judge

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28 UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

In re: ) IN PROCEEDINGS UNDER CHAPTER 7  
STACIE ESTAY ) NO. 19-12349  
Debtors. ) ORDER AVOIDING LIEN OF  
CREDIT INTERNATIONAL  
CORPORATION

This matter having come on for hearing before the above entitled court upon the motion  
of Ken Schneider for an order avoiding lien of Credit International Corporation and good cause  
having been shown and the court being fully advised in the premises, now, therefore, and after  
due deliberation the Court finds:

1. Snohomish County Superior Court has in its possession \$784.74 which was withheld from the

ORDER TO AVOID LIEN - 1

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EVERETT, WA 98201 (425) 258-2704

1 debtor's paycheck as directed by the writ of garnishment.

2 2. Judgment Creditor has a judicial lien on these funds.

3 3. The entire amount held by the Snohomish County Superior Court would have been exempt if

4 paid over to the debtor and the entire amount is impaired by the lien.

5 IT IS HEREBY ORDERED, ADJUDGED and DECREED that:

6 1. The judicial lien of judgment creditor, Credit International Corporation, on funds held by

7 Snohomish County Superior Court, belonging to the debtor is hereby avoided.

8 2. Snohomish County Superior Court is hereby directed to pay over any funds held pursuant to

9 the writ of garnishment in case number 13-2-07327-5 to debtor's attorney Ken Schneider at 2015

10 33<sup>rd</sup> Street, Everett, Washington, 98201

11 //End of Order///

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22 Presented by:

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24  
25 Ken Schneider, WSBA #22410  
26 Attorney for Debtor